



**San Francisco Bay
Regional Water
Quality Control
Board**

2101 Webster Street
Suite 500
Oakland, CA 94612
(510) 286-1255
FAX (510) 286-1380

N00296.003232
MOFFETT FIELD
SSIC NO. 5090.3



August 12, 1998
File No. 2189.8009 (CJC) Pete Wilson
Governor

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Stephen Chao
900 Commodore Drive
San Bruno, CA 94066-2402

**Subject: Responses to Comments on the Revised Draft Final Station-Wide
Feasibility Study Report (SWFS), Moffett Federal Airfield, June 1998**

Dear Mr. Chao:

The San Francisco Bay Regional Water Quality Control Board (RWQCB), appreciates the Navy's response to our comments on the Draft Final SWFS. Most of RWQCB's comments have been responded adequately except the following items. The Navy should discuss the remaining issues with the regulatory agencies in a timely manner and the Regional Board's approval of the Final SWFS is contingent upon the Navy's final response.

1. The Regional Board is pleased to know that the Navy will use HQ_3 or $HQ_4 > 1$ (HQ_3 and HQ_4 are Hazard Quotients derived from low Toxicity Reference Values) to establish cleanup goals for avian and mammalian receptors and $HQ > 1$ for benthic community at Moffett Field. However, it was not clear to us if $HQ_3 > 1$ or $HQ_4 > 1$ will be selected. Please provide more information in the Final SWFS.
2. The following State regulatory requirements should be considered as ARARs and incorporated into the Final SWFS:

San Francisco Bay Basin Plan

Establishes water quality objectives, including narrative and numerical standards, that protect the beneficial uses and water quality objectives of surface and ground waters in the region. Describes implementation plans and other control measures designed to ensure compliance with statewide plans and policies and provide comprehensive water quality planning. The San Francisco Bay Basin Plan also includes implementation actions for setting soil cleanup levels for soils which threaten water quality. Specific applicable portions of the Basin Plan include beneficial uses of affected water bodies and water quality objectives to protect those uses. Any activity, including, but not limited to, the discharge of contaminated soils or waters or in-situ treatment or containment of contaminated soils or waters, must not result in actual water quality exceeding water quality objectives.



RWQCB, San Francisco Bay Basin Plan, "Policy for Application of Water Quality Objectives"

This policy defines water quality objectives and explains how the Regional Water Board applies numerical and narrative water quality objectives to ensure the reasonable protection of beneficial uses of water and how the Regional Water Board applies Resolution No. 68-16 to promote the maintenance of existing high quality waters. It applies to all cleanups of discharges that may affect water quality.

State Water Resources Control Board Resolution No. 68-16 ("Antidegradation Policy")

Requires that high quality surface and ground waters be maintained to the maximum extent possible. Degradation of waters will be allowed (or allowed to remain) only if it is consistent with the maximum benefit to the people of the state, will not unreasonably affect present and anticipated beneficial uses, and will not result in water quality less than that prescribed in RWQCB and SWRCB policies. If degradation is allowed, the discharge must meet best practicable treatment or control, which must prevent pollution or nuisance and result in the highest water quality consistent with maximum benefit to the people of the state. The Antidegradation Policy requires that high quality surface and ground waters be maintained to the maximum extent possible. Degradation of waters will be allowed (or allowed to remain) only if it is consistent with the maximum benefit to the people of the state, will not unreasonably affect present and anticipated beneficial uses, and will not result in water quality less than that prescribed in RWQCB and SWRCB policies. If degradation is allowed, the discharge must meet best practicable treatment or control, which must prevent pollution or nuisance and result in the highest water quality consistent with maximum benefit to the people of the state.

State Water Resources Control Board Resolution No. 92-49 (As amended April 21, 1994)

Establishes requirements for investigation and cleanup and abatement of discharges. Among other requirements, dischargers must clean up and abate the effects of discharges in a manner that promotes the attainment of either background water quality, or the best water quality that is reasonable if background water quality cannot be restored. Requires the application of Title 23, CCR, Section 2550.4 requirements to cleanups. The "92-47" applies to all cleanups of discharges that may affect water quality.

Title 27, California Code of Regulations (CCR), Division 2, Subdiv. 1 (Section 20080 et seq.), Title 23, CCR, Division 3, Chapter 15, (Section 2510 et seq.)

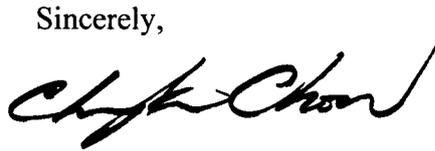
Establishes waste and siting classification systems and minimum waste management standards for discharges of waste to land for treatment, storage, and



disposal. Engineered alternatives that are consistent with Title 27/ Title 23 performance goals may be considered. Establishes corrective action requirements for responding to leaks and other unauthorized discharges. Applies to all discharges of waste to land for treatment, storage, or disposal that may affect water quality.

If you have any questions on these comments, please contact me at (510) 622-2334.

Sincerely,



C. Joseph Chou
Remedial Project Manager

cc:
Ms. Lynn Suer, Ph. D.
U. S. Environmental Protection Agency
Region IX, Mail Stop H-9-2
75 Hawthorne Street
San Francisco, CA 94105

Ms. Sandy Olliges
Assistant Chief
Safety, Health and Environmental Services
National Aeronautics and Space Administration
Ames Research Center
Moffett Field, CA 94035-1000

Mr. Jim Haas, Ph. D.
U.S. Fish and Wild Life Service
3310 El Camino Avenue, Suite 130
Sacramento, CA 95821

Mr. Scott A. Flint
Office of Spill Prevention and Response
California Department of Fish and Game
P. O. Box 944209
1700 K Street, suite 250
Sacramento, CA 94244-2090



Mr. James G. McClure, Ph. D.
Moffett Field RAB, THE committee
c/o Harding Lawson Associates
90 Digital Drive
Novato, CA 94949-5704

Mr. Peter Strauss
PM Strauss & Associates
317 Rutledge Street
San Francisco, CA 94110

